

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES))
FOR THE STATE OF OKLAHOMA,)
Plaintiff,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,)
Defendants.)

THE VIDEOTAPED DEPOSITION OF
TIMOTHY MAUPIN, produced as a witness on behalf of
the Plaintiff in the above styled and numbered
cause, taken on the 15th day of May, 2008, in the
City of Wichita, County of Sedgewick, State of
Kansas, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

Exhibit 26

TULSA FREELANCE REPORTERS
918-587-2878

69d9db49-1933-4916-a244-595f09264c31

1 material they handed out was voluminous on a lot of
2 subjects; correct?

3 A Yes. It was a large document.

4 Q And a lot of it dealt with handling and
5 disposition of poultry waste as the name would
6 imply; correct?

01:30PM

7 A Poultry litter, yes.

8 Q Okay. Did you ever present any materials in
9 any of the symposiums that you attended?

10 A I don't recall where. It seems to me I did
11 present at one of the Poultry Waste Management
12 Symposiums.

01:30PM

13 Q Did you assist in authoring materials that may
14 have been presented by others at any symposiums?

15 MR. EHRICH: Object to the form.

01:30PM

16 A Not that I recall.

17 Q Let's talk about Cargill in a more recent time
18 frame, all right, and so that I'm clear in
19 understanding, Cargill owns the birds that are
20 placed in the contract growers' farms; correct?

01:31PM

21 A That's correct.

22 Q And the title of those birds always remain
23 with Cargill; correct?

24 A That's correct.

25 Q When Rocco operated, did it retain title to

01:31PM

1 its birds when placed on contract grower farms, same
2 as Cargill does?

3 A That's correct.

4 Q So it didn't make any change in its
5 operational way as it pertains to that once acquired 01:31PM
6 by Cargill?

7 MR. EHRICH: Object to the form.

8 A Not in the ownership relationship with the
9 birds.

10 Q That's the intention of my contract or my 01:31PM
11 question.

12 A Yes.

13 Q Who owns the feed that is given or provided to
14 the birds for Cargill growing?

15 A Cargill. 01:31PM

16 Q And are the growers allowed to introduce any
17 feed that's not presented by Cargill to them?

18 A No. They should not feed feed that's not
19 produced by Cargill.

20 Q Does Cargill in fact grow a lot of the feed 01:32PM
21 that it uses in its poultry operations from its
22 other businesses?

23 A Don't know the answer to that.

24 Q The additives -- the additives that are placed
25 in the feed and given to the birds, that's -- those 01:32PM